

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CEMA JOINT VENTURE	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
CHARTER ONE BANK, N.A.	)	
	)	
and	)	No. 13-cv-5511 (NRB)
	)	
THE ROYAL BANK OF	)	
SCOTLAND GROUP PLC,	)	
c/o CHARTER ONE BANK, N.A.	)	
	)	
Defendants.	)	
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**CORPORATE DISCLOSURE STATEMENT OF DEFENDANTS RBS CITIZENS, N.A.  
AND THE ROYAL BANK OF SCOTLAND GROUP PLC**

Pursuant to Rule 7.1 of the Rules of Federal Rules of Civil Procedure, Defendants RBS Citizens, N.A., incorrectly sued as Charter One Bank, N.A.,<sup>1</sup> and The Royal Bank of Scotland Group plc (“RBS Group”), make the following disclosures through their undersigned counsel: Defendant RBS Citizens, N.A. is a wholly-owned subsidiary of RBS Citizens Financial Group, Inc., which in turn is an indirect, wholly-owned subsidiary of Defendant RBS Group. RBS Group has no parent corporation, and no publicly-held company owns ten percent (10%) or more of RBS Group’s stock.

Dated: August 14, 2013

/s/ Fraser L. Hunter, Jr.  
Fraser L. Hunter, Jr.  
Wilmer Cutler Pickering Hale and Dorr LLP  
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250 Greenwich Street  
New York, NY 10007

<sup>1</sup> Charter One Bank, N.A., is the trade name for RBS Citizens, N.A., the proper defendant legal entity.

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and RBS Citizens, N.A.*